

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

John Scatchell,

Plaintiff,

v.

Village of Melrose Park, an Illinois Municipal  
Corporation; Ronald M. Serpico; Sam C. Pitassi;  
Michael Castellan; and Steven Rogowski,

Defendants.

Case No.: 2018-cv-03989

Judge John Kness

**UNOPPOSED PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSES TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT TO AND  
INCLUDING MARCH 11, 2021 DUE TO PLAINTIFF'S COUNSEL GETTING COVID-19**

Plaintiff, John Scatchell through his undersigned attorney, Disparti Law Group, makes the following request for an extension of time up to and including March 11, 2021 to file Plaintiff's Responses to Defendants' Motions for Summary Judgment for the following reasons:

1. Plaintiff's Counsel discussed this Motion with Defendants' Counsel on January 25, 2021 and confirmed that there is no objection.
2. Plaintiff's Counsel has had numerous other time-consuming matters preventing her completion of the instant Responses over the past month, including: Plaintiff's counsel was diagnosed with COVID-19 on December 28, 2020 and was quarantined from her office with heavy symptoms and illness (e.g. headache, cough, fever, extreme fatigue, loss of taste and smell, chest tightness, shortness of breath, and dizziness). A copy of her positive test results are available for an in-camera review.

3. I have substantial time in February to complete the Plaintiff's Responses and anticipate no further requests for extension.

4. This Motion is not for dilatory purposes, is in good faith, and is to ensure that complete, well-prepared, and well-researched Responses are filed in this matter.

### **CONCLUSION**

For the foregoing reasons, Plaintiffs respectfully request that this Honorable Court grant their Motion enlarging their time to file Responses to All Defendants' Motions for Summary Judgment up to and including March 11, 2021.

Dated: January 25, 2021

Respectfully submitted,

*/s/ Gianna Scatchell*

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### **CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that he served this Plaintiff's Motion for Extension of Time to file Response to Summary Judgment Motions to all counsel-of-record via this Court's CM/ECF filing system on January 25, 2021, and that such counsels are registered efilers.

*/s/ Gianna Scatchell*

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Gianna Scatchell